

## EXHIBIT 3

1 Scott E. Radcliffe, (CA BAR NO. 278098)

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7 Attorneys for Plaintiff

8 Blaine Harrington III

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IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

MAUREEN HARRINGTON, as  
personal representative for the estate of  
BLAINE HARRINGTON III,

Plaintiff,

v.

DEEPAK DUGAR, M.D. a MEDICAL  
CORPORATION,

Defendant.

Civil Action No. 2:22-cv-08230-PA-E

**PLAINTIFF'S RESPONSES TO  
DEFENDANT'S FIRST REQUEST  
FOR ADMISSIONS**

to Rules 26 and 36 of the Federal Rules of Civil Procedure,  
plaintiff/counter-defendant Maureen Harrington, as personal representative of the  
estate of Blaine Harrington III ("Plaintiff"), submits these responses to

1        36. Admit that you have no evidence to support a contention that Dugar  
2 Corp. infringed a copyright in the photograph that is the subject of our RFA no.

3 38.

4  
5        **RESPONSE:** Denied.

6        37. Admit that you have no evidence that Dugar Corp acted willfully in  
7 connection with any infringement you might contend he committed with respect to  
8 the photograph that is the subject of your RFA no. 38.

9  
10        **RESPONSE:** Denied.

11        38. Admit that you have never licensed the use of the Subject Photograph.

12        **RESPONSE:** Admitted.

13        39. Admit that you have never licensed the use of the Subject Photograph  
14 specifically for use on a user's website.

15        **RESPONSE:** Admitted.

16        40. Admit that you have never sent a takedown notice to a web host with  
17 respect to the Subject Photograph.

18  
19        **RESPONSE:** Admitted.

20        41. Admit that you have never tried to a verdict a case for copyright  
21 infringement of a photograph in which you claimed to own the copyright.

22        **RESPONSE:** Admitted.

1  
2 Dated: May 25, 2023.

ALVES RADCLIFFE LLP

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4 By: /s/ Scott E. Radcliffe

5 SCOTT E. RADCLIFFE

6 Attorney for Plaintiff

Blaine Harrington III

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8 **CERTIFICATE OF SERVICE**

9 I hereby certify that on May 25, 2023, I served the foregoing document via  
10 e-mail to: Vincent L. Ravine, Esq. ([vince@vravinelaw.com](mailto:vince@vravinelaw.com)) and Jeffrey L.  
11 Squires, Esq. ([jsquires@squireslegal.com](mailto:jsquires@squireslegal.com)).

12  
13 /s/ Scott E. Radcliffe  
Scott E. Radcliffe, Esq.